

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS**

**PATRICIA WOLFE,
Plaintiff,**

v.

**Civil Action No.
04-10762-DPW**

**FAIRBANKS CAPITAL CORPORATION,
Defendant.**

**MOTION TO EXTEND TIME TO RESPOND TO MOTION TO
REMAND**

Plaintiff requests that the Court extend the time for Plaintiff's response to Defendant's Motion To Remand to June 10, 2004.

I.

Plaintiff has just completed preparing and filing a Writ of Certiorari to the United States Supreme Court and that action took more time and energy than contemplated by Plaintiff's counsel. Therefore, Plaintiff's counsel has not been able to complete the response to the Defendant's Motion For Remand. Plaintiff's counsel requests an extension to complete the response until June 10, 2004.

II.

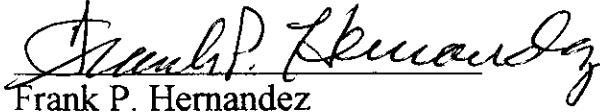
This request for an extension of time to respond is not for purposes of delay, but so that justice may be done.

**FILED
IN CLERKS OFFICE
2004 JUN -1 P 2:14**

**U.S. DISTRICT COURT
DISTRICT OF MASS.**

WHEREFORE, PREMISES CONSIDERED, Plaintiff moves the Court to grant this request for time to respond.

Respectfully submitted,



Frank P. Hernandez

716 Wayne

Dallas, TX 75223

214-821-1213

Fax 214-821-1214

E-mail: fgeagle@aol.com

TBC# 09516000

Attorney For Plaintiff

CERTIFICATE OF CONFERENCE

I certify that on May 27, 2004 and May 28, 2004 I spoke with Mr. Brooks R. Brown's assistants as he is on vacation for some time and out of the office and they were unable to contact him to see if he opposed this motion. Therefore, I cannot certify as to his position on the motion.



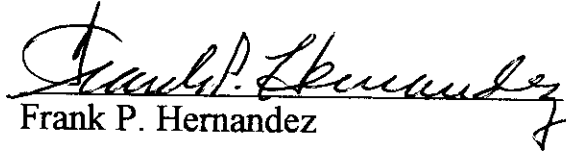
Frank P. Hernandez

CERTIFICATE OF SERVICE

I certify that I faxed a copy and mailed a copy, regular mail, to counsel for Defendant, Mr. Brooks R. Brown, Esq., at 617-227-8591 and

**PLAINTIFF'S MOTION TO EXTEND TIME TO RESPOND TO 2
MOTION TO REMAND**

Goodwin Procter, LLP, Exchange Place, Boston, MA 02109 on this the 28th
day of May 2004.


Frank P. Hernandez